

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Ellen S. Ewald,

Plaintiff,

vs.

Royal Norwegian Embassy,

Defendant.

)
)
) Civil No. 11-CV-02116 (SRN/SER)
)
)
)

**AFFIDAVIT OF
SEAN R. SOMERMEYER**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Sean R. Somermeyer, being duly sworn, states as follows:

1. I am one of the attorneys representing Defendant Royal Norwegian Embassy in the above-captioned matter.

2. Attached as Exhibit A to this affidavit is a true and correct copy of Defendant's Objections and Responses to Plaintiff's Third Set of Requests for Admissions.

3. Attached as Exhibit B to this affidavit is a true and correct copy of a July 15, 2013 email from S. Fischer to counsel for Defendant.

4. Attached as Exhibit C to this affidavit is a true and correct copy of a July 16, 2013 letter from S. Engelmeier to counsel for Defendant.

5. Attached as Exhibit D to this affidavit is a true and correct copy of a July 26, 2013 letter from J. Schroeder to S. Engelmeier.

6. Attached as Exhibit E is Defendant's privilege log produced on November 7, 2013. Along with this privilege log, Defendant provided Plaintiff a properly-redacted copy of RNE 88231-35.

7. Attached as Exhibit F is a true and correct copy of a December 6, 2013 letter from me to counsel for Plaintiff.

8. Attached hereto as Exhibit G is a true and correct copy of a December 10, 2013 letter from T. Marshall to me.

9. On December 5, 2013, I conferred with counsel for Plaintiff regarding Defendant's privilege log as required by the Court's October 8, 2013 Order.

This concludes my affidavit consisting of two (2) typewritten pages.

s/ Sean R. Somermeyer
Sean R. Somermeyer

Subscribed and sworn to before me
this 11th day of December, 2013.

s/Susan A. Yelk
Notary Public

My Commission Expires January 31, 2014